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Richard Chin, Ryan M. Dunlap, Stephen Galliker, Mary  
Ann Gray, Steven A. Kriegsman and Rudolph Nisi, and  
Nominal Defendant SELLAS Life Sciences Group, Inc.  
f/k/a Galena Biopharma, Inc.*

*Additional Counsel Listed on Signature Page*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

REED JOHNSON, Derivatively on Behalf of  
SELLAS LIFE SCIENCES GROUP, INC. (f/k/a  
GALENA BIOPHARMA, INC.),

Plaintiff,

v.

MARK W. SCHWARTZ, RYAN M. DUNLAP,  
CHRISTOPHER S. LENTO, REMY BERNARDA,  
WILLIAM L. ASHTON, RICHARD CHIN, IRVING  
M. EINHORN, STEPHEN GALLIKER, MARY  
ANN GRAY, SANFORD J. HILLSBERG,  
STEVEN A. KRIEGSMAN, and RUDOLPH NISI,

Defendants,

and

SELLAS LIFE SCIENCES GROUP, INC. f/k/a  
GALENA BIOPHARMA, INC.,

Nominal Defendant.

C.A. No. 2:18-cv-00903-KM-JBC

**Oral Argument Requested**

**NOTICE OF DEFENDANTS' MOTION TO DISMISS  
THE VERIFIED SHAREHOLDER DERIVATIVE COMPLAINT**

**PLEASE TAKE NOTICE** that on a date and time that the Court will schedule, Defendants SELLAS Life Sciences Group, Inc. f/k/a Galena Biopharma, Inc., William L. Ashton, Remy Bernarda, Richard Chin, Ryan M. Dunlap, Stephen Galliker, Mary Ann Gray, Steven A. Kriegsman Rudolph Nisi, Christopher S. Lento, and Mark W. Schwartz shall move the Honorable Kevin McNulty, U.S.D.J., at the Frank R. Lautenberg U.S. Post Office & Courthouse, Federal Square in Newark, New Jersey, for an Order dismissing with prejudice the Verified Shareholder Derivative Complaint in this matter pursuant to Rule 23.1 and Rule 12(b)(6) of the Federal Rules of Civil Procedure and granting such other and further relief as the Court deems equitable and appropriate.

**PLEASE TAKE FURTHER NOTICE** that, in support of this motion, Defendants rely upon the accompanying Memorandum of Law and Declaration of Shahzeb Lari and exhibits thereto. Defendants also submit a Proposed Order with this motion.

**PLEASE TAKE FURTHER NOTICE** that Defendants request oral argument on this motion.

July 16, 2020

/s/ Eric Blumenfeld

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/s/ Sandra L. Musumeci [with permission]

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*Attorneys for Defendant Mark W. Schwartz*

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 16, 2020, I served the following papers via the Court's CM/ECF system on all counsel of record: (1) Defendants' Notice of Motion to Dismiss the Verified Shareholder Derivative Complaint; (2) Defendants' Memorandum of Law in support of the Motion; (3) the Declaration of Shahzeb Lari; (4) a proposed form of Order; and (5) this Certification of Service.

/s/ Eric Blumenfeld